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District of Nevada
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Attorneys for the United States

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

IT IS STIPULATED AND AGREED, by and between SIGAL CHATTAH, United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United States of America, and George Robinson, Esquire, counsel for the defendant Jon Gabriel Requena, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about July 24, 2024, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of 36 C.F.R. § 4.23(a)(1). See ECF No. 7.

1 2. The parties agreed to recommend that defendant be sentenced to one year of
2 unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a
3 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
4 DUI course and (2) Victim Impact Panel; (iii) shall complete an eight (8) hour online alcohol
5 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
6 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.
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8 3. On July 24, 2024, this Court sentenced defendant pursuant to the parties' plea
9 agreement. *See* ECF No. 7.

10 4. Since commencing his term of unsupervised probation, defendant has
11 successfully completed conditions (i), (ii), (iii), (iv) and (v).

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2 5. As such, the parties jointly request that the defendant be allowed to withdraw
3 his guilty plea to count one and the government moves to amend count one to Reckless
4 Driving. The parties also jointly request that the above-captioned matter be closed.
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6 DATED this 1st day of July, 2025.
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8 Respectfully submitted,
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10 SIGAL CHATTAH
11 United States Attorney
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13 /s/ *George Robinson* _____
14 GEORGE ROBINSON, ESQ.
15 Attorney for Defendant
16 **JON GABRIEL REQUENA**
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13 /s/ *Skyler Pearson* _____
14 SKYLER PEARSON
15 Assistant United States Attorney
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**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
JON GABRIEL REQUENA,
Defendant.

Case No.: 2:24-mj-0414-BNW

ORDER TO CLOSE THE CASE

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant Jon Gabriel Requena has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and the that count one be amended to Reckless Driving.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 8th day of July, 2025

Ben Wexler
UNITED STATES MAGISTRATE JUDGE